



THE CITY OF NEW YORK
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February 15, 2017

BY ECF

Honorable Steven L. Tiscione
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Oquan Hardy v. City of New York, et al.
16-CV-5804 (KAM)(ST)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to represent defendants City of New York and Police Officer Ibrahim Cisse in the above-referenced matter. Pursuant to the Court's Order dated December 13, 2016, enclosed please find a copy of the parties' Discovery Plan Worksheet.

Thank you for your consideration herein.

Respectfully submitted,

/s/

David Ferrari
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Baree N. Fett (*by ECF*)
Attorney for Plaintiff

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:	2/17/17
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	4/18/17
Date for initial settlement conference: <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	5/3/17
Phase II (Discovery and Motion Practice)	
Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post initial settlement conference)</i>	5/18/17
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	6/2/17
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	9/18/17
Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	N/A
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	N/A
COMPLETION OF ALL DISCOVERY BY: <i>(Presumptively 9 months after Initial Conference)</i>	<div style="background-color: yellow; height: 10px; width: 100%;"></div> 9/18/17
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	10/18/17
Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	No